

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

Sandra Elaine Alcantar,)	Case No. 1:21-cv-01538-SKO
Plaintiff,)	STIPULATION AND ORDER FOR
)	SECOND EXTENSION OF TIME
vs.)	(Doc. 15)
Kilolo Kijakazi, Acting)	
Commissioner of Social Security,)	
)	
Defendant.)	
)	
)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 30-day extension of time, from June 21, 2022 to July 21, 2022, for Plaintiff to serve on defendant with Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Plaintiff's second request for an extension of time. Good cause exists for this extension. For the weeks of May 30, 2022 and June 6, 2022, Counsel for Plaintiff has 23 merit briefs, and several letter briefs and reply briefs.

1 For the remainder of the month of June 2022, there are 19 additional merit briefs
2 currently scheduled.

3 Additionally, Counsel for the Plaintiff continues to experience post-surgery
4 complications including pain, requiring significant rest periods throughout the day.
5 Thus, there have been delays in work productivity.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

8
9 Respectfully submitted,

10 Dated: May 25, 2022 PENA & BROMBERG, ATTORNEYS AT LAW
11

12 By: /s/ Jonathan Omar Pena
13 JONATHAN OMAR PENA
14 Attorneys for Plaintiff
15

16 Dated: May 26, 2022 PHILLIP A. TALBERT
17 United States Attorney
18 PETER K. THOMPSON
19 Acting Regional Chief Counsel, Region IX
20 Social Security Administration
21

22 By: */s/ Mary Tsai
23 Mary Tsai
24 Special Assistant United States Attorney
25 Attorneys for Defendant
26 (*As authorized by email on May 26, 2022)
27
28

ORDER

Based upon the foregoing stipulation of the parties (Doc. 15), and for good cause shown (Fed. R. Civ. P. 16(b)(4)),

IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including July 21, 2022, in which to file her motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 12) shall be extended accordingly.

IT IS SO ORDERED.

Dated: May 31, 2022

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE